

SMITH & SMITH

GERALD K. SMITH AND JOHN C. SMITH

LAW OFFICES, PLLC

ATTORNEYS AT LAW
6720 E. Camino Principal, Suite 203
Tucson, AZ 85715
Tel: (520) 722-1605
Fax: (520) 844-8070

Gerald K. Smith, State Bar No. 001428
Email: gerald@smithandsmithpllc.com
John C. Smith, State Bar No. 023008
Email: john@smithandsmithpllc.com
Will Sherman, State Bar No. 034221
Email: will.sherman@gmx.com

Attorneys for Creditor David Parri

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF ARIZONA

In re Skyline Ridge, LLC,

Debtor.

Chapter 11 Proceedings

Case No. 4:18-bk-01908-BMW

CREDITOR DAVID PARRI'S RENEWAL OF OBJECTION TO CONFIRMATION OF DEBTOR'S PLAN

Creditor David Parri renews his objection to confirmation of the Debtor's Second Amended, Modified, and Restated Plan of Reorganization Dated June 4, 2019 [DE 399] for the reasons stated in his original Objection to Debtor's Second Amended Plan of Reorganization [DE 281].

As previously stated, Debtor's Plan fails to comply with the applicable provisions of the Bankruptcy Code, including, but not limited to §§ 1123(a)(1) and (2), fails to provide essential elements under §1129(a), and clearly fails to meet the requisites necessary for cram down; and therefore, the Debtor's Plan should not be confirmed.

DATED this 6th day of June 2019.

**GERALD K. SMITH AND JOHN C.
SMITH LAW OFFICES, PLLC**

By: /s/ John C. Smith

John C. Smith

Attorney for Creditor David Parri

1 Original of the foregoing
2 electronically filed June 6, 2019, with:

3 Clerk, United States Bankruptcy Court
4 District of Arizona
5 38 South Scott Avenue
6 Tucson, AZ 85701
7 <https://ecf.azb.uscourts.gov>

8 COPY of the foregoing mailed or emailed* on
9 June 6, 2019, to:

10 Michael W. Baldwin*
11 MICHAEL BALDWIN, PLC
12 12080 E. 8th Street
13 Tucson, AZ 85748- 8903
14 Email: michaelbaldwin12625@gmail.com
15 *Attorneys for Debtor*

16 Jennifer A. Giaimo*
17 OFFICE OF THE U.S. TRUSTEE
18 230 N. First Ave., #204
19 Phoenix, AZ 85003-1706
20 Email: Jennifer.A.Giaimo@usdoj.gov

21 Jill H. Perrella
22 Snell & Wilmer LLP
23 One South Church Avenue, #1500
24 Tucson, AZ 85701-1633
25 Email: jperrella@swlaw.com
26 *Attorneys for Northern Trust Bank*

27 Adam B. Nach
28 Lane & Nach PC
2001 E. Campbell Avenue, #103
Phoenix, AZ 85016
Email: adam.nach@lane-nach.com
Attorneys for Trudy Nowak

Christopher S. McDonagh
Raven Clancy & McDonagh PC
3507 N. Campbell Avenue, Suite 111
Tucson, AZ 85719-2000
Email: cmcdonagh@ravlaw.com
Attorneys for Fotinos Properties, LLC

Lisa S. Kass
Folks Hess Kass PLLC
1850 N. Central Avenue, #1140
Phoenix, AZ 85004-4586
Email: kass@folkshesskass.com
Attorneys for Arceegee, LLC

Robert M. Charles
Lewis Roca Rothgerber Christie LLP
One South Church Avenue, Suite 2000
Tucson, AZ 85701-1611
Email: rcharles@lrrc.com
Attorneys for Cinco Soldados, LLC

Kasey C. Nye
Waterfall Economidis Caldwell
Hanshaw & Villamana, P.C.
5210 E. Williams Circle, Suite 800
Tucson, AZ 85711-4482
Email: knye@waterfallattorneys.com
Attorneys for Rallis Group

Isaac D. Rothschild
Mesch Clark Rothschild
259 N. Meyer Avenue
Tucson AZ 85701-1007
Email: irothschild@mcrazlaw.com
Attorneys for Elevens, LLC

1 Pima County Attorney's Office
2 32 N. Stone Avenue Suite 2100
3 Tucson, AZ 85701-1458
4 Email: pcaocvbk@pcao.pima.gov
Pat P. Lopez, III

Rusing, Lopez & Lizardi, PLLC
6363 N. Swan Rd., Suite 151
Tucson, AZ 85718 Phone:
Email: plopez@rllaz.com
Attorney for Samuel Zarifi

5
6 /s/ Kate Manns
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28